

Mr. Steve Yoder
Wieland Designs, Incorporated
901 East Madison Street, Suite A
Goshen, Indiana 46526-3500

Re: 039-15065
First Minor Permit Modification to
Part 70 No.: T 039-7692-00258

Dear Mr. Yoder:

Wieland Designs, Incorporated was issued a Part 70 permit on September 30, 1998 for a stationary source that manufacture automobile, medical and airline seating. A letter requesting changes to this permit was received on October 3, 2001. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The changes consist of incorporating the applicable requirements for the following facilities permitted under the Minor Source Modification 039-14892:

- (a) One (1) new Latex Spray Booth, identified as EU-02 capable of painting a maximum of 6.25 wood frames per hour, equipped with High Volume Low Pressure (HVLP) paint applicator and venting through stack S-B. The PM overspray from this booth is controlled by dry filters; and
- (b) Increase in the adhesive usage at the existing three (3) Adhesive Glue Spray Booths, identified as EU-01A; and five (5) Adhesive Glue Spray Booths identified as EU-01B due to product mix change and customer demands and have a maximum capacity of 16.07 units per hour. These booths are used in gluing fabric parts to foam inserts. The three Adhesive Glue Spray Booths, EU-01A vent through stacks S-A1, S-A2 and S-A3 and are equipped with air spray application system and HVLP. The five (5) Adhesive Glue Spray Booths identified as EU-01B vents inside the building, identified as GV. The PM overspray from these booths is controlled by dry filters.

The following applicable requirements shall apply to the above equipment and shall replace all existing conditions in Section D.1 of the Part 70 Permit:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to the seating's wood components applied in the new Latex Spray Booth, EU-02 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application

Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Volatile Organic compounds (VOC) Input Limit [326 IAC 2-7-10.5(d)(5)] and [326 IAC 8-1-6]

The total VOC input usage to the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and the latex spray booth EU-02 shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. Compliance with this limit by the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) latex spray booth EU-02 shall make 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) not applicable, and shall also make 326 IAC 8-1-6 (General Reduction Requirements) not applicable for the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) only.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the PM overspray emissions from the new Latex Spray Booth, identified as EU-02, shall be limited using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the three (3) Adhesive Glue Spray Booths, identified as EU-01A, shall not exceed 1.4 pounds per hour when operating at a process weight rate of 401.8 pounds per hour.
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the the (5) Adhesive Glue Spray Booths identified as EU-01B, shall not exceed 0.99 pound per hour when operating at a process weight rate of 241.09 pounds per hour.

The pounds per hour limitation shall be calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility, EU-02 and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required by this permit to perform compliance tests on these facilities. However, the Commissioner reserves the right to invoke its authority under 26 IAC 2-1.1-11 to require stack testing at any time to assure compliance with all applicable requirements. If testing will be required testing shall be conducted in accordance with Section C- Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.7 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and the Latex Spray Booth EU-02 are in operation.

D.1.8 Operator Training Program

- (a) The three (3) Adhesive Spray Booths (EU-01A), which vent through stacks S-A1, S-A2 and S-A3; and the new Latex Spray Booth EU-02, which vents through stack S-B shall comply with the following:
 - (1) Wieland Designs, Incorporated shall implement the following operator-training program.
 - (A) All operators that perform the adhesive and surface coating operations, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of the permit issuance. All new operators shall be trained upon hiring or transfer.
 - (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
 - (C) All operators shall be given refresher training annually.
 - (2) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

- (3) To document compliance with Condition D.1.3, Wieland Designs, Incorporated shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) For the five (5) Adhesive Spray Booths, EU-01B, which currently do not directly exhaust into the atmosphere, the Permittee shall comply with the following conditions:
 - (1) When the vents from the five (5) Adhesive Spray Booths, EU-01B have been redirected into the atmosphere, Wieland Designs, Incorporated shall implement the following operator-training program.
 - (A) All operators that perform the adhesive and surface coating operations, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of the permit issuance. All new operators shall be trained upon hiring or transfer.
 - (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
 - (C) All operators shall be given refresher training annually.
 - (2) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
 - (3) To document compliance with Condition D.1.3, Wieland Designs, Incorporated shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (4) A Notification of the date when the vents from the five (5) Adhesive Spray Booths, EU-01B have been redirected into the atmosphere shall be submitted to IDEM, OAQ.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2.
 - (1) The amount and VOC content of each paint, adhesive material and clean-up solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (2) A log of the months of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain copies of the training program, the list of trained operators, and training records; and
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of the Part 70 permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**Part 70 Minor Source Modification
Quarterly Report**

Source Name: Wieland Designs, Incorporated
Source Address: 901 East Madison Street, Suite A, Goshen, Indiana 46526
Mailing Address: 901 East Madison Street, Suite A, Goshen, Indiana 46526
Part 70 Permit No.: T039-7692-00258
Facility: Eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and latex spray booth (EU-02)
Parameter: VOC
Limit: The VOC input usage to the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and latex spray booth EU-02 shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis to avoid 326 IAC 2-7-10.5(f) (Significant Source Modification). Compliance with this limit shall also make 326 IAC 8-1-6 (General Reduction Requirements) not applicable for the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) only.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File -Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Tony Pelath
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Wieland Designs, Inc.
901 East Madison Street
Goshen, Indiana 46526-3500**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|---|---|
| Operation Permit No.: T039-7692-00258 | |
| Issued by: Felicia R. George, Assistant Commissioner Office of Air Management | Issuance Date: September 30, 1998 |
| First Administrative Amendment No.: 039-10286, issued on March 23, 1999 First Significant Permit Modification No.: 039-10964, issued on September 15, 1999 | |
| First Minor Permit Modification No.: 039-15065 | Pages Added: 25a, 25b, 27a Pages Affected: 4, 24, 25, 27 |
| Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Permit Branch Office of Air Quality | Issuance Date: April 11, 2002 |

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary automobile, medical, and airline seating manufacturing plant. The seating is composed of fabric, wood, and foam padding.

Responsible Official: Steve Yoder
Source Address: 901 East Madison Street, Suite A, Goshen, IN 46526-3500
Mailing Address: 901 East Madison Street, Suite A, Goshen, IN 46526-3500
SIC Code: 3714
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) new Latex Spray Booth, identified as EU-02 capable of painting a maximum of 6.25 wood frames per hour, equipped with High Volume Low Pressure (HVLP) paint applicator and venting through stack S-B. The PM overspray from this booth is controlled by dry filters; and
- (b) Increase in the adhesive usage at the existing three (3) Adhesive Glue Spray Booths, identified as EU-01A; and five (5) Adhesive Glue Spray Booths identified as EU-01B due to product mix change and customer demands and have a maximum capacity of 16.07 units per hour. These booths are used in gluing fabric parts to foam inserts. The three Adhesive Glue Spray Booths, EU-01A vent through stacks S-A1, S-A2 and S-A3 and are equipped with air spray application system and HVLP. The five (5) Adhesive Glue Spray Booths identified as EU-01B vents inside the building, identified as GV. The PM overspray from these booths is controlled by dry filters.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) natural gas fired boiler, with a rated capacity of 0.8315 million British thermal units per hour (MM Btu/hr), and
- (b) Woodworking operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

It is a major source, as defined in 326 IAC 2-7-1(22).

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) new Latex Spray Booth, identified as EU-02 capable of painting a maximum of 6.25 wood frames per hour, equipped with High Volume Low Pressure (HVLP) paint applicator and venting through stack S-B. The PM overspray from this booth is controlled by dry filters; and
- (b) Increase in the adhesive usage at the existing three (3) Adhesive Glue Spray Booths, identified as EU-01A; and five (5) Adhesive Glue Spray Booths identified as EU-01B due to product mix change and customer demands and have a maximum capacity of 16.07 units per hour. These booths are used in gluing fabric parts to foam inserts. The three Adhesive Glue Spray Booths, EU-01A vent through stacks S-A1, S-A2 and S-A3 and are equipped with air spray application system and HVLP. The five (5) Adhesive Glue Spray Booths identified as EU-01B vents inside the building, identified as GV. The PM overspray from these booths is controlled by dry filters.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to the seating's wood components applied in the new Latex Spray Booth, EU-02 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Volatile Organic compounds (VOC) Input Limit [326 IAC 2-7-10.5(d)(5)] and [326 IAC 8-1-6]

The total VOC input usage to the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and the latex spray booth EU-02 shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. Compliance with this limit by the eight (8) Adhesive Spray Booths (EU-01A and EU-01B), and the latex spray booth EU-02 shall make 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) not applicable, and shall also make 326 IAC 8-1-6 (General Reduction Requirements) not applicable for the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) only.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the PM overspray emissions from the new Latex Spray Booth, identified as EU-02, shall be limited using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000)

pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the three (3) Adhesive Glue Spray Booths, identified as EU-01A, shall not exceed 1.4 pounds per hour when operating at a process weight rate of 401.8 pounds per hour.
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the (5) Adhesive Glue Spray Booths identified as EU-01B, shall not exceed 0.99 pound per hour when operating at a process weight rate of 241.09 pounds per hour.

The pounds per hour limitation shall be calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility, EU-02 and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required by this permit to perform compliance tests on these facilities. However, the Commissioner reserves the right to invoke its authority under 26 IAC 2-1.1-11 to require stack testing at any time to assure compliance with all applicable requirements. If testing will be required testing shall be conducted in accordance with Section C- Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.7 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and the Latex Spray Booth EU-02 are in operation.

D.1.8 Operator Training Program

- (a) The three (3) Adhesive Spray Booths (EU-01A), which vent through stacks S-A1, S-A2 and S-A3; and the new Latex Spray Booth EU-02, which vents through stack S-B shall comply with the following:
 - (1) Wieland Designs, Incorporated shall implement the following operator-training program.
 - (A) All operators that perform the adhesive and surface coating operations, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of

the date of the permit issuance. All new operators shall be trained upon hiring or transfer.

- (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
 - (C) All operators shall be given refresher training annually.
- (2) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
 - (3) To document compliance with Condition D.1.3, Wieland Designs, Incorporated shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) For the five (5) Adhesive Spray Booths, EU-01B, which currently do not directly exhaust into the atmosphere, the Permittee shall comply with the following conditions:
- (1) When the vents from the five (5) Adhesive Spray Booths, EU-01B have been redirected into the atmosphere, Wieland Designs, Incorporated shall implement the following operator-training program.
 - (A) All operators that perform the adhesive and surface coating operations, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of the permit issuance. All new operators shall be trained upon hiring or transfer.
 - (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
 - (C) All operators shall be given refresher training annually.
 - (2) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
 - (3) To document compliance with Condition D.1.3, Wieland Designs, Incorporated shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (4) A Notification of the date when the vents from the five (5) Adhesive Spray Booths, EU-01B have been redirected into the atmosphere shall be submitted to IDEM, OAQ.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2.
 - (1) The amount and VOC content of each paint, adhesive material and clean-up solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the months of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain copies of the training program, the list of trained operators, and training records; and
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of the Part 70 permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**Part 70 Minor Source Modification
Quarterly Report**

Source Name: Wieland Designs, Incorporated
Source Address: 901 East Madison Street, Suite A, Goshen, Indiana 46526
Mailing Address: 901 East Madison Street, Suite A, Goshen, Indiana 46526
Part 70 Permit No.: T039-7692-00258
Facility: Eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and latex spray booth EU-02
Parameter: VOC
Limit: The VOC input usage to the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and latex spray booth EU-02 shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis to avoid 326 IAC 2-7-10.5(f) (Significant Source Modification). Compliance with this limit shall also make 326 IAC 8-1-6 (General Reduction Requirements) not applicable for the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) only.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management

Office of Air Quality

Addendum to the Technical Support Document for a Minor Modification to a Part 70 Operating Permit

Source Name: Wieland Designs, Inc.
Source Location: 901 East Madison Street, Suite A, Goshen, Indiana 46526-3500
County: Elkhart
SIC Code: 3714
Operation Permit No.: T039-7692-00258 Issuance Date: September 30, 1998
Minor Permit Modification: 039-15065
Permit Reviewer: Aida De Guzman

On January 16, 2002, the Office of Air Quality (OAQ) had a notice published in the Goshen News, Goshen, Indiana, stating that Wieland Designs, Inc. had applied for a Minor Part 70 Operating Permit Modification to incorporate operational changes permitted in Minor Source Modification 039-14892. The notice also stated that OAQ proposed to issue a permit for this operational changes and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 19, 2002, the source has submitted the following comments to the proposed permit:

Comment 1: The source feels that some requirements listed in the modification should not be applicable to the booths that do not exhaust to the atmosphere. The dry filters in these booths are not a necessary part of the process and are not necessary to ensure compliance with 326 IAC 6-3-2 as demonstrated in previous documentation submitted to IDEM. Therefore, it is inappropriate and unnecessarily burdensome to require filters to be used and to require operator training for these booths. The source request that appropriate changes be made to the permit to reflect the above comments.

Response 1: Wieland chose a Compliance Determination Condition, which is the Operator Training Program in Condition D.1.8 in place of the "daily, weekly and monthly dry filters inspection Compliance Monitoring Condition". Sources given this option must be aware that filters that are not functioning properly would be considered in violation of the Part 70 permit. Also, the Compliance Branch has been consulted regarding the Compliance Monitoring requirements for the five (5) adhesive glue spray booths, exhausting inside the building. As a result, Conditions D.1.8, has been revised as follows (changes are **bolded** and deletions are ~~struck through~~ for emphasis):

Compliance Monitoring-Determination Requirements

D.1.8 Operator Training Program

(a) The ~~eight (8)~~ **three (3)** Adhesive Spray Booths (EU-01A ~~and EU-01B~~), which vent through stacks S-A1, S-A2 and S-A3; and the new Latex Spray Booth EU-02, which vents through stack S-B shall comply with the following:

(1) Wieland Designs, Incorporated shall implement the following operator-training program.

- (A) All operators that perform the adhesive and surface coating operations, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of the permit issuance. All new operators shall be trained upon hiring or transfer.
 - (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
 - (C) All operators shall be given refresher training annually.
- (2) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (3) To document compliance with Condition D.1.3, Wieland Designs, Incorporated shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) **For the five (5) Adhesive Spray Booths, EU-01B, which currently do not directly exhaust into the atmosphere, the Permittee shall comply with the following conditions:**
 - (1) **When the vents from the five (5) Adhesive Spray Booths, EU-01B have been redirected into the atmosphere, Wieland Designs, Incorporated shall implement the following operator-training program.**
 - (A) All operators that perform the adhesive and surface coating operations, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of the permit issuance. All new operators shall be trained upon hiring or transfer.
 - (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
 - (C) All operators shall be given refresher training annually.

- (2) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**
- (3) To document compliance with Condition D.1.3, Wieland Designs, Incorporated shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.**
- (4) A Notification of the date when the vents from the five (5) Adhesive Spray Booths, EU-01B have been redirected into the atmosphere shall be submitted to IDEM, OAQ.**

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2.
 - (1) The amount and VOC content of each paint, adhesive material and clean-up solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the months of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain copies of the training program, the list of trained operators, and training records; and
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Permit Modification

Source Background and Description

| | | | |
|--------------------------------|--|----------------|--------------------|
| Source Name: | Wieland Designs, Incorporated | | |
| Source Location: | 901 East Madison Street, Goshen, Indiana 46526 | | |
| County: | Elkhart | | |
| SIC Code: | 3714 | | |
| Operation Permit No.: | T039-7692-00258 | Issuance Date: | September 30, 1998 |
| Minor Permit Modification No.: | 039- 15065-00258 | | |
| Permit Reviewer: | Aida De Guzman | | |

The Office of Air Quality (OAQ) has reviewed a modification application from Wieland Designs, Incorporated relating to the operation of following emission units and pollution control devices permitted in the Minor Source Modification 039-14892. These facilities are used in the manufacture of the automobile, medical and airline seating, made out of fabric, wood and foam padding:

- (a) One (1) new Latex Spray Booth, identified as EU-02 capable of painting a maximum of 6.25 wood frames per hour, equipped with High Volume Low Pressure (HVLP) paint applicator and venting through stack S-B. The PM overspray from this booth is controlled by dry filters; and
- (b) Increase in the adhesive usage at the existing three (3) Adhesive Glue Spray Booths, identified as EU-01A; and five (5) Adhesive Glue Spray Booths identified as EU-01B due to product mix change and customer demands and have a maximum capacity of 16.07 units per hour. These booths are used in gluing fabric parts to foam inserts. The three Adhesive Glue Spray Booths, EU-01A vent through stacks S-A1, S-A2 and S-A3 and are equipped with air spray application system and HVLP. The five (5) Adhesive Glue Spray Booths identified as EU-01B vents inside the building, identified as GV. The PM overspray from these booths is controlled by dry filters.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 3, 2001.

Emission Calculations

- (a) Adhesive and Latex Spray Booths: The emissions coming from these booths were determined in the Minor Source Modification 039-14892. This permit modification will not result in any change in the emissions.

State Rule Applicability

This permit modification will not result in any change to the state rule applicability already determined. See determination made in the Minor Source Modification 039-14892.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source stays the same as in the Minor Source Modification 039-14892.

Changes to the Part 70 Permit:

The following are the changes to the Part 70 Permit 039-7692-00258 (changes are bolded and deletions are struck-through for emphasis):

- (1) Section A.2 Emissions Units and Pollution Control Equipment Summary in the Part 70 Permit will be modified as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) ~~Seven (7) adhesive glue spray booths, identified as EU-01, with a maximum capacity of 1804 pounds of fabric parts glued to foam inserts per hour, utilizing high volume low pressure method of spraying, using dry filters as control, and exhausting to stack, S-A, and general ventilation.~~
- (a) **One (1) new Latex Spray Booth, identified as EU-02 capable of painting a maximum of 6.25 wood frames per hour, equipped with High Volume Low Pressure (HVLV) paint applicator and venting through stack S-B. The PM overspray from this booth is controlled by dry filters; and**
- (b) **Increase in the adhesive usage at the existing three (3) Adhesive Glue Spray Booths, identified as EU-01A; and five (5) Adhesive Glue Spray Booths identified as EU-01B due to product mix change and customer demands and have a maximum capacity of 16.07 units per hour. These booths are used in gluing fabric parts to foam inserts. The three Adhesive Glue Spray Booths, EU-01A vent through stacks S-A1, S-A2 and S-A3 and are equipped with air spray application system and HVLV. The five (5) Adhesive Glue Spray Booths identified as EU-01B vents inside the building, identified as GV. The PM overspray from these booths is controlled by dry filters.**

- (2) The following Section D.1 will replace the entire existing SECTION D.1 in the Part 70 Permit 039-7692-00258:

~~D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~Pursuant to 326 IAC 6-3-2 (c), the PM from the seven (7) adhesive booths shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~$$E = 4.10 P^{0.67}$$
 where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour~~

~~D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

~~D.1.3 Volatile Organic Compound (VOC)[326 IAC 8-1-6]~~

~~Pursuant to 326 IAC 8-1-6 (General reduction requirements for new facilities), any change or modification which may increase the potential VOC emissions to 25 tons per year or more from the adhesive spray booths must be approved by the Office of Air Management (OAM) before such change may occur.~~

~~D.1.4 Volatile Organic Compound (VOC)[326 IAC 8-2-11]~~

~~Pursuant to 326 IAC 8-2-11 (b)(1)(A)(Fabric and Vinyl Coating), volatile organic compound~~

~~content of the coating applied to fabric shall not exceed 2.9 pounds VOC per gallon of coating less water delivered to the applicator.~~

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter or VOC limits specified in Conditions D.1.1, D.1.3, or D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Particulate Matter (PM)

~~The dry filters for PM control shall be in place at all times when the seven (7) adhesive spray booths are in operation.~~

D.1.7 Monitoring

~~(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stack SA while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

~~(a) To document compliance with Conditions D.1.1, D.1.3, and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.3 and D.1.4.~~

~~(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(2) A log of the dates of use;~~

~~(3) The volume weighted VOC content of the coatings used for each month;~~

- ~~_____ (4) The cleanup solvent usage for each month;~~
- ~~_____ (5) The total VOC usage for each month; and~~
- ~~_____ (b) To document compliance with Condition D.1.1, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~_____ (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- ~~(1) Seven (7) adhesive glue spray booths, identified as EU-01, with a maximum capacity of 1804 pounds of fabric parts glued to foam inserts per hour, utilizing high volume low pressure method of spraying, using dry filters as control, and exhausting to stack, S-A, and general ventilation.~~
- (a) One (1) new Latex Spray Booth, identified as EU-02 capable of painting a maximum of 6.25 wood frames per hour, equipped with High Volume Low Pressure (HVLP) paint applicator and venting through stack S-B. The PM overspray from this booth is controlled by dry filters; and**
- (b) Increase in the adhesive usage at the existing three (3) Adhesive Glue Spray Booths, identified as EU-01A; and five (5) Adhesive Glue Spray Booths identified as EU-01B due to product mix change and customer demands and have a maximum capacity of 16.07 units per hour. These booths are used in gluing fabric parts to foam inserts. The three Adhesive Glue Spray Booths, EU-01A vent through stacks S-A1, S-A2 and S-A3 and are equipped with air spray application system and HVLP. The five (5) Adhesive Glue Spray Booths identified as EU-01B vents inside the building, identified as GV. The PM overspray from these booths is controlled by dry filters.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to the seating's wood components applied in the new Latex Spray Booth, EU-02 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates

between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Volatile Organic compounds (VOC) Input Limit [326 IAC 2-7-10.5(d)(5)] and [326 IAC 8-1-6]

The total VOC input usage to the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and the Latex Spray Booth EU-02 shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis. Compliance with this limit by the eight (8) Adhesive Spray Booths (EU-01A and EU-01B), and the Latex Spray Booth EU-02 shall make 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) not applicable, and shall also make 326 IAC 8-1-6 (General Reduction Requirements) not applicable for the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) only.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the PM overspray emissions from the new Latex Spray Booth, identified as EU-02, shall be limited using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the three (3) Adhesive Glue Spray Booths, identified as EU-01A, shall not exceed 1.4 pounds per hour when operating at a process weight rate of 401.8 pounds per hour.
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the (5) Adhesive Glue Spray Booths identified as EU-01B, shall not exceed 0.99 pound per hour when operating at a process weight rate of 241.09 pounds per hour.

The pounds per hour limitation shall be calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility, EU-02 and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required by this permit to perform compliance tests on these facilities. However, the Commissioner reserves the right to invoke its authority under 26 IAC 2-1.1-11 to require stack testing at any time to assure compliance with all applicable requirements. If testing will be required testing shall be conducted in accordance with Section C- Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and the Latex Spray Booth EU-02 are in operation.

D.1.8 Operator Training Program

The eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and the new Latex Spray Booth EU-02 shall comply with the following:

- (a) Wieland Designs, Incorporated shall implement the following operator-training program.
 - (1) All operators that perform the adhesive and surface coating operations, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of the permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.3, Wieland Designs, Incorporated shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2.
 - (1) The amount and VOC content of each paint, adhesive material and clean-up solvent used. Records shall include purchase orders, invoices, and

material safety data sheets (MSDS) necessary to verify the type and amount used.

- (2) A log of the months of use;**
 - (3) The cleanup solvent usage for each month;**
 - (4) The total VOC usage for each month; and**
 - (5) The weight of VOCs emitted for each compliance period.**
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain copies of the training program, the list of trained operators, and training records; and**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of the Part 70 permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**Part 70 Minor Source Modification
Quarterly Report**

Source Name: Wieland Designs, Incorporated
Source Address: 901 East Madison Street, Suite A, Goshen, Indiana 46526
Mailing Address: 901 East Madison Street, Suite A, Goshen, Indiana 46526
Part 70 Permit No.: T039-7692-00258
Facility: Eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and latex spray booth EU-02
Parameter: VOC
Limit: The VOC input usage to the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) and latex spray booth EU-02 shall be limited to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis to avoid 326 IAC 2-7-10.5(f) (Significant Source Modification). Compliance with this limit shall also make 326 IAC 8-1-6 (General Reduction Requirements) not applicable for the eight (8) Adhesive Spray Booths (EU-01A and EU-01B) only.

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.